

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**DECLARATION OF LAURA K. CLINTON IN SUPPORT OF BLUMS’
MOTION *IN LIMINE***

I, Laura K. Clinton, hereby declare as follows:

1. I am a partner at Baker & McKenzie, LLP. My firm serves as counsel to Dr. Joel Blum and Dr. Norman Blum, who are among the group of “Participating Customers” in opposition to the Trustee’s Profit Withdrawal Motion in the above-captioned proceeding. I am authorized to make this Declaration on the Blums’ behalf and in support of their Motion *in Limine*.

2. Attached hereto as Exhibit A is a true and correct copy of the Trustee’s Pre-Hearing Witness and Exhibit List.

3. Attached hereto as Exhibit B1-B6 are true and correct copies of the relevant deposition excerpts cited in the Motion *in Limine*.

4. Attached hereto as Exhibit C is a true and correct copy of the “Proof of Transfers To Certain BLMIS Customers With Profit Withdrawal” of July 14, 2015, prepared by Lisa M. Collura, CPA, CFE, CFF, without exhibits.

5. Attached hereto as Exhibit D is a true and correct copy of the Supplemental “Proof of Transfers To Certain BLMIS Customers With Profit Withdrawal” of December 17, 2015, prepared by Lisa M. Collura, CPA, CFE, CFF, without exhibits.

6. Attached hereto as Exhibit E is a true and correct copy of the “Analysis of the Profit Withdrawal Transactions” of July 14, 2015, prepared by Matthew B. Greenblatt CPA/CFF, CFF, without exhibits.

7. Attached hereto as Exhibit F is a true and correct copy of the Supplemental “Analysis of the Profit Withdrawal Transactions” of December 17, 2015, prepared by Matthew B. Greenblatt CPA/CFF, CFF, without exhibits.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

/s/Laura K. Clinton

Laura K. Clinton

Dated: October 28, 2016
Seattle, WA

CERTIFICATE OF SERVICE

I certify that on October 28, 2016, I arranged for electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record via the CM/ECF system.

/s/Laura K. Clinton

Laura K. Clinton (*Pro Hac Vice*)